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7 *Attorney for Defendant*
8 *Jose Mendez*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MARIO CASTRO, JOSE SALUD
15 CASTRO, SALVADOR CASTRO,
16 MIGUEL CASTRO, JOSE LUIS
17 MENDEZ, and ANDREA BURROW

18 Defendants.

2:19-cr-00295-GMN-NJK

**Stipulation to Continue
Deadline for Informal
Objections to PSR**

19 IT IS HEREBY STIPULATED AND AGREED, by and between
20 Timothy Finley, Trial Attorney, U.S. Department of Justice, counsel for the
21 United States of America, and William H. Brown, counsel for defendant Jose
22 Luis Mendez, that the LCR 32-1(b) deadline to submit informal objections to
23 the presentence investigation report (PSR) shall be continued at least 14 days
24 (to at least August 15, 2023).

25 This Stipulation is entered into for the following reasons:

- 26
27 1. This is the first request to continue the LCR 32-1(b) deadline.
28

1 2. The PSR is lengthy (30 pages) and in English.

2 3. Because Mr. Mendez speaks very little English, the PSR must be
3 translated into Spanish for Mr. Mendez, who will then require time to read
4 the PSR and meet with the defense to discuss it.

5 4. According to the defense's translator, it will take until August 8
6 to translate the PSR, which is after the current (August 1) deadline to submit
7 informal objections.
8

9 5. Therefore, the current deadline doesn't allow sufficient time for
10 meaningful review of the PSR, or the opportunity for the defense to make
11 appropriate informal objections.
12

13 6. The requested continuance will allow for both.

14 7. Neither Mr. Mendez (who is out of custody), nor the government,
15 nor the PSR's author objects to continuing the deadline.
16

17 Dated: July 26, 2023
18

19 JASON M. FRIERSON
20 United States Attorney
21

BROWN MISHLER, PLLC

22 */s/ Timothy Finley*

/s/ William H. Brown

23 By _____
24 TIMOTHY FINLEY
Trial Attorney, USDOJ

By _____
WILLIAM H. BROWN
Counsel for Jose Luis Mendez

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7 *Attorney for Defendant*
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:19-cr-00295-GMN-NJK

12 Plaintiff,

**Order Continuing Deadline for
Informal Objections to PSR**

13 vs.

14 MARIO CASTRO, JOSE SALUD
15 CASTRO, SALVADOR CASTRO,
16 MIGUEL CASTRO, JOSE LUIS
17 MENDEZ, and ANDREA BURROW

18 Defendants.

19 Based on the pending stipulation of counsel, and good cause appearing
20 therefore, the Court hereby extends the LCR 32-1(b) deadline to submit
21 informal objections to the presentence investigation report (PSR), to

22 _____August 15, 2023_____.

23 DATED this 31 day of July, 2023

24
25 
26 _____
27 UNITED STATES DISTRICT JUDGE
28